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Attorneys for Defendants
Brian K. Taylor and Christian Taylor

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

In re ROCKWELL DEBT FREE PROPERTIES, INC., Debtor.	Bankruptcy No. 20-25326 (KRA) Chapter 7 Honorable Kevin R. Anderson
STEVEN R. BAILEY, Chapter 7 Trustee, Plaintiff, v. BRIAN K. TAYLOR; LOWELL TAYLOR; CHRISTIAN TAYLOR, Defendant.	ANSWER OF DEFENDANTS BRIAN K. TAYLOR AND CHRISTIAN TAYLOR

**ANSWER OF DEFENDANTS BRIAN K. TAYLOR AND CHRISTIAN TAYLOR TO
PLAINTIFF’S COMPLAINT**

Defendants Brian K. Taylor and Christian Taylor, by their undersigned counsel, answers
Plaintiff’s complaint (“**Complaint**”) as follows:

JURIDICTION, VENUE, AND PARTIES

1. Lack information and therefore deny.
2. Lack information and therefore deny.
3. Lack information and therefore deny.
4. Lack information and therefore deny.
5. Lack information and therefore deny.
6. Deny.
7. Deny that Lowell Taylor is a resident of Utah; Mr. Lowell Taylor is deceased.
8. Admit.

FACTUAL ALLEGATIONS

9. Lack information and therefore deny.
10. Deny.
11. Deny.
12. Deny.

FIRST CLAIM FOR RELIEF
(11 U.S.C. § 548—Fraudulent Transfer)

13. Incorporate prior responses.
14. No response is required to this statement of law.
15. No response is required to this statement of law.
16. No response is required to this statement of law.
17. No response is required to this statement of law.
18. Deny.
19. Deny.

20. Deny.

21. Deny.

22. Deny.

SECOND CLAIM FOR RELIEF
(11 U.S.C. §§ 550 & 551—Transferee Liability and Preservation)

23. Incorporate prior responses.

24. Deny.

25. Deny.

26. Deny.

THIRD CLAIM FOR RELIEF
(11 U.S.C. § 542—Turnover)

27. Incorporate prior responses.

28. Deny.

29. Deny.

30. Deny.

FOURTH CLAIM FOR RELIEF
(11 U.S.C. § 502(d)—Disallowance of Claims)

31. Incorporate prior responses.

32. Deny.

REQUEST FOR RELIEF

Deny all Request for Relief.

FIRST DEFENSE
(Failure to State a Claim)

The Complaint fails to state a claim upon which relief can be granted.

**SECOND DEFENSE
(Statute of Limitations)**

The Plaintiff's claim is barred by the statute of limitations.

**THIRD DEFENSE
(Equivalent Value)**

The Plaintiff's claim is barred because the Debtor received reasonably equivalent value for the monies he transferred to the Defendants from the services the Defendants provided to the Debtor.

**FOURTH DEFENSE
(Solvency)**

The Plaintiff's claim is barred because the Debtor was solvent at the time of the transfer to the Defendants.

**FIFTH DEFENSE
(Look-Back Period)**

The Plaintiff's claim is barred because the transfer occurred outside of the two-year look-back period.

WHEREFORE, Defendants Brian K. Taylor and Christian Taylor respectfully request that the Court:

- A. Enter judgment in Defendants' favor dismissing the Complaint with prejudice.
- B. Award Defendants their reasonable costs and fees, including attorneys' fees.
- C. Grant Defendants such other and further relief as the Court deems just and proper.

JURY DEMAND

Defendants Brian K. Taylor and Christian Taylor demand a trial by jury on all issues

triable by a jury.

DATED this 6th day of October 2023.

Respectfully submitted,

KUNZLER BEAN & ADAMSON

/s/ Chad S. Pehrson

Chad S. Pehrson

Marcia Fuller Durkin

Attorneys for Defendants

Brian K. Taylor and Christian Taylor

CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I hereby certify that on October 6, 2023, I electronically filed the foregoing **ANSWER OF DEFENDANTS BRIAN K. TAYLOR AND CHRISTIAN TAYLOR TO PLAINTIFF’S COMPLAINT** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

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Attorneys for Steven R. Bailey, Chapter 7 Trustee

/s/ Chad S. Pehrson